

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :	:	DATE FILED: 06-124 _____
v.	:	CRIMINAL NO. 3/21/06 _____
SAMSON ADEYEMI	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (conspiracy to
	:	interfere with interstate commerce by
	:	robbery - 1 count)
	:	18 U.S.C. § 1951(a) (interference with
	:	interstate commerce by robbery
	:	- 2 counts)
	:	18 U.S.C. § 924(c)(1) (using and carrying
	:	a firearm during a crime of violence
	:	- 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. The following restaurants located in Philadelphia, Pennsylvania were engaged in interstate commerce:

- a. Taco Bell, located at 4600 City Line Avenue; and
- b. McDonalds, located at 101 S. 52nd Street.

2. On or about January 3, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMSON ADEYEMI

conspired and agreed together with others known and unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, in that defendant ADEYEMI conspired to unlawfully take and obtain money and other items of value from the businesses set forth in paragraph 1 above, in the presence of employees of the businesses, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was part of the conspiracy that the defendant SAMSON ADEYEMI and others known and unknown to the grand jury (“the conspirators”):

3. Obtained over \$852 in cash through the commission of two armed robberies of businesses listed in paragraph 1 above, and by placing employees of those businesses in fear of physical harm.

4. Traveled together to business establishments opened for service to the general public in Philadelphia, Pennsylvania.

5. Ordered food at the take out window of the businesses, requiring the cashier to open the window.

6. Threatened and intimidated at gunpoint the employees working at the take out windows of the restaurants to obtain cash.

7. Stole cash from the business.

8. Received a portion of the stolen money.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the defendant and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

THE TACO BELL ARMED ROBBERY

On or about January 3, 2006 at approximately 12:56 a.m.:

1. SAMSON ADEYEMI drove to the area of the Taco Bell with two others, armed with a handgun.
2. Defendant ADEYEMI drove to the take out window of the restaurant and placed a food order.
3. The two other robbers ran up to the take out window. One of them pointed a gun at the employee of the restaurant and demanded money.
4. Defendant ADEYEMI drove his car around the corner and waited, while the other two robbers stole \$622 from the employee and ran to the car, at which point defendant ADEYEMI drove off.

THE McDONALD'S ARMED ROBBERY

On January 3, 2006, at approximately 3:15 a.m.:

5. Defendant ADEYEMI drove to the area of McDonald's with two others, armed with a handgun.
6. Defendant ADEYEMI drove to the take out window of the restaurant and placed a food order.

7. Defendant ADEYEMI said he did not have money with him to pay for the food, and the robbers did not run up to the window when the food was ready, so defendant ADEYEMI left the restaurant without his food.

8. Several minutes later, ADEYEMI returned to the take out window and paid for his food order. Defendant ADEYEMI drove away and waited around the corner.

9. The two other robbers ran up to the employees at the take out window and demanded money. One robber pointed a silver handgun at the employees. The robber reached into the take out area of the restaurant and removed the cash drawer, which contained \$230.21, from the cash register.

10. The other two robbers ran to the car defendant ADEYEMI was driving, still carrying the cash drawer, and ADEYEMI drove off.

All in violation of Title 18, United States Code, Section 1951(a) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1a. of Count One of this indictment is incorporated here.
2. On or about January 3, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMSON ADEYEMI

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant ADEYEMI unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash and other items of value from Taco Bell, located at 4600 City Line Avenue in Philadelphia, Pennsylvania, in the presence of an employee of Taco Bell and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of Taco Bell, by pointing a firearm at, demanding money from, and otherwise threatening her.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 3, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMSON ADEYEMI

knowingly used and carried, and aided and abetted the use and carrying of, a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951(a).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1b. of Count One of this indictment is incorporated here.
2. On or about January 3, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMSON ADEYEMI

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant ADEYEMI unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, cash from McDonald's, located at 101 S. 52nd Street in Philadelphia, Pennsylvania, in the presence of employees of the McDonald's, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees of McDonald's, by pointing a firearm at, demanding money from, and otherwise threatening them.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 3, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMSON ADEYEMI

knowingly used and carried, and aided and abetted in the use and carrying of, a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951(a).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney